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04/15/2003 11:33 AM

To: Harriett Jones/ARTD/R7/USEPA/US@EPA
cc: Jon Knodel/ARTD/R7/USEPA/US@EPA, Ward Burns/ARTD/R7/USEPA/US@EPA, Richard Tripp/ARTD/R7/USEPA/US@EPA
Subject: Boeing Comments

FYI.

Pamela Muren
Environmental Engineer, PE
(573) 751-4817

----- Forwarded by Pam Muren/APCP/DEQ/MODNR on 04/15/2003 11:33 AM -----

Pam Muren
04/15/2003 11:13 AM

To: Randy Raymond/APCP/DEQ/MODNR@MODNR, Tom Wilson/APCP/DEQ/MODNR@MODNR
cc: Amish Daftari/APCP/DEQ/MODNR@MODNR
Subject: Boeing Comments

FYI - Here are the comments we received from Boeing on the "draft" OP. We are working on the response to comments.

Pamela Muren
Environmental Engineer, PE
(573) 751-4817

----- Forwarded by Pam Muren/APCP/DEQ/MODNR on 04/15/2003 11:11 AM -----

"Pierce, Yvonne"
<yvonne.pierce@boeing.com>
04/14/2003 02:34 PM

To: "Pam Muren (E-mail)" <nrmurep@mail.dnr.state.mo.us>, "Amish Daftari (E-mail)" <nrdafta@mail.dnr.state.mo.us>
cc: "Spoerle, Bret S" <bret.s.spoerle@boeing.com>
Subject: Boeing Comments

<<Boeing STC Comments (April 14, 2003).doc>>

Attached are our comments. I have to go get my kid at school. Talk to you soon.

Yvonne

Boeing STC Comments (April 14, 2003).doc

Boeing would prefer to continue the programmatic approach as described in Boeing letter 464C-5371-AYP dated February 20, 2003 to MDNR, but have received no response from MDNR with regard to this topic. In light of the absence of information, please delete the following bullet.

- Records of the random monthly inspections will be maintained.

Page 15, Condition EU0020 through EU0030

Boeing appreciates MDNR's efforts to streamline the permit, but due to the differing regulatory requirements, Cold Cleaners and Spray Gun Cleaners should be separated. 40 CFR Part 63, Subpart GG does not apply to cold cleaners. Also, all of our cold cleaners (with one exception addressed separately) are aqueous.

Page 15, Condition EU0030-002

Boeing notes that these spray gun cleaners are covered by both the Aerospace NESHAP and the Aerospace RACT rule. As discussed above, Boeing has given consideration to MDNR and EPA's suggestion to streamline the applicable requirements of the Aerospace NESHAP and the Missouri Aerospace RACT rule. Since there appears to be great overlap between the requirements for spray gun cleaners, Boeing believes that the NESHAP and RACT provisions can be streamlined along the lines proposed for Building Fugitive Activities, EU0010.

Page 19, Permit Condition (EU-0060 through EU0110)-002

As discussed previously, Boeing has given consideration to MDNR and EPA's suggestion to streamline the applicable requirements of the Aerospace NESHAP and the Missouri Aerospace RACT rule. With respect to coatings operations, there appears to be great overlap between the two requirements, with the notable exception of the application of specialty coatings. Boeing believes that the NESHAP and RACT provisions for coating operations can be streamlined, so long as the specialty coating requirements are clearly called out, and proposes that the permit conditions for Aerospace NESHAP and Aerospace RACT requirements be streamlined into one provision along the lines proposed for Building Fugitive Activities and Spray Gun Cleaning. Boeing would anticipate that the streamlined language would also reflect the comments provided in Boeing's letter 464C-5371-AYP, dated February 20, 2003. In addition, Boeing has additional specific comments to the proposed language which are presented below.

Page 19, Permit Condition (EU-0060 through EU0110)-002, Emission Limitation

The paragraph starting "*Compliance Methods*" is not worded correctly. Please

reword "...the following methods either in by themselves or in conjuction..." to "...the following methods either by themselves or in conjuction..."

Page 19, Condition EU0060 through EU0110-002, Emission Limitations

Boeing does not have a control system and does not anticipate the need to use a control system in the future. Therefore, Boeing recommends deletion of the following bullet.

- *Controlled coatings – control system requirements.* Each control system shall reduce the operation's organic HAP and VOC emissions to the atmosphere by 81% or greater, taking into account capture and destruction or removal efficiencies, as determined using the procedures in §63.750(h) when a control device other than a carbon absorber is used. (§63.745(d))

Page 19, Permit Condition (EU-0060 through EU0110)-002, Emission Limitation

The sections following the paragraph starting "*Compliance Methods*" are formatted such that it is unclear which of them are under that section and which are new sections.

Page 19, Permit Condition (EU-0060 through EU0110)-002, Emission Limitation

There is an excess bullet prior to the "Inorganic HAPs-" section.

Page 19, Condition EU0060 through EU0110-002, Emission Limitations

Delete the following:

> The primer application is considered in compliance when the conditions specified in paragraphs (1) to (2) below are met. Failure to meet any one of the conditions indentified in these paragraphs shall constitute noncompliance. (§63.749(d)(3))
> (1) The overall control sytem efficiency, Ek, as determined using the procedure specified in §63.750(h) for control systems with control systems other than carbon absorbers, is equal to or greater than 81% during initial performance test and any subsequent performance test; (§63.749(d)(3)(ii)(A))
> (2) Operates all application techniques in accordance with the manufacture's specificaitons or locally prepared operating procedures, whichever is more stringent. (§63.749(d)(3)(iv))
>
> The topcoat application operation is considered in compliance when the conditions specified in paragraphs (1) through (2) are met. Failure to meet any of the conditions identified in these paragraphs shall constitute

noncompliance. (§63.749(d)(4))

(1) The overall control system efficiency, Ek, as determined using the procedures specified in §63.750(h) for control systems with control devices other than carbon absorbers, is equal to or greater than 81% during initial performance test and any subsequent performance test; (§63.749(d)(4)(ii))

(2) Operates all application techniques in accordance with the manufacture's specificaitons or locally prepared operating procedures, whichever is more stringent. (§63.749(d)(4)(iv))

And insert the following

The primer application is considered in compliance when the conditions specified in paragraphs (1) through (3) below are met. Failure to meet any one of the conditions indentified in these paragraphs shall constitute noncompliance. (§63.749(d)(3))

(1) All values of H(i) and H(a) (as determined using the procedures specified in §63.750(c) and (d)) are less than or equal to 350 grams of organic HAP per liter (2.9 lb/gal) of primer (less water) as applied, and all values of G(i) and G(a) (as determined using the procedures specified in §63.750(e) and (f)) are less than or equal to 350 grams of organic VOC per liter (2.9 lb/gal) of primer (less water and exempt solvents) as applied.

(2) Uses an application technique specified in §63.745(f)(1)(i) through (f)(1)(ix).

(3) Operates all application techniques in accordance with the manufacturer's specifications or locally prepared operating procedures, whichever is more stringent.

The topcoat application operation is considered in compliance when the conditions specified in paragraphs (1) through (3) are met. Failure to meet any of the conditions identified in these paragraphs shall constitute noncompliance. (§63.749(d)(4))

(1) All values of H(i) and H(a) (as determined using the procedures specified in § 63.750(c) and (d)) are less than or equal to 420 grams organic HAP per liter (3.5 lb/gal) of topcoat (less water) as applied, and all values of G(i) and G(a) (as determined using the procedures specified in § 63.750(e) and (f)) are less than or equal to 420 grams organic VOC per liter (3.5 lb/gal) of topcoat (less water and exempt solvents) as applied.

(2) Uses an application technique specified in §63.745(f)(1)(i) through (f)(1)(ix).

(3) Operates all application techniques in accordance with the manufacturer's specifications or locally prepared operating procedures.

Page 20, Condition EU0060 through EU0110-002, Emission Limitations

Remove requirements that do not apply and add additional applicable regulatory language. In addition, Boeing has identified painting operations where it is not technically feasible to paint the parts in a booth. Delete the following:

> 3. If the pressure drop across the dry particulate filter system, as recorded pursuant to §63.752(d)(1), is outside the limit(s) specified by the filter manufacture or in locally prepared operating procedures, shut down the operation immediately and take corrective action. If the water path in the waterwash system fails the visual continuity/flow characteristics check, or the water flow rate recorded pursuant to §63.752(d)(2) exceeds the limit(s) specified by the booth manufacture or in locally prepared operating procedures, or the booth manufacture's or locally prepared maintenance procedures for the filter or waterwash system have not been performed as scheduled, shut down the operation immediately and take corrective action. The operation shall not be resumed until the pressure drop or water flow rate is returned within specified limits(s). (§63.745(g)(3))

Replace with:

> 3. If the pressure drop across the dry particulate filter system, as recorded pursuant to § 63.752(d)(1), is outside the limit(s) specified by the filter manufacturer or in locally prepared operating procedures, shut down the operation immediately and take corrective action. The operation shall not be resumed until the pressure drop is returned within the specified limit(s).
> 4. The requirements of paragraphs §63.745 (g)(1) through (g)(3) of this section do not apply to the following:
> (a) Touch-up of scratched surfaces or damaged paint;
> (b) Hole daubing for fasteners;
> (c) Touch-up of trimmed edges;
> (d) Coating prior to joining dissimilar metal components;
> (e) Stencil operations performed by brush or air brush;
> (f) Section joining;
> (g) Touch-up of bushings and other similar parts;
> (h) Sealant detackifying;
> (i) Painting parts in an area identified in a title V permit, where the permitting authority has determined that it is not technically feasible to paint the parts in a booth as follows
>
> (i) The part is too large to be painted in a booth.
> (ii) The coatings are not spray applied.
> (iii) The part would need to be removed from a fixture/tool to be painted in a booth.
> (iv) Cycle time restrictions prior to subsequent operations make it time prohibitive to move the part to a paint booth.
> (v) Other operations where engineering analysis recommends the part be painted outside of a booth.

(vi) Painting of joint areas, sealant areas, or small standards parts including but not limited to bushings, fasteners, nuts, shims, and spacers that is incidental to the application of the coating and is required to achieve complete coverage.

(j) The use of hand-held spray can application methods.

Page 21, Condition EU0060 through EU0110-002, Operational Limitation

Please correct the following typographical errors

Under 1.(vi) delete the "1" prior to the word "Electrodeposition"

In 2. add a "r" after the "e" in the word "manufacture's"

Page 21, Condition EU0060 through EU0110-002, Operational Limitation

The exemptions listed in §63.745(f)(3) need to be added to this section of the permit.

Page 21, Condition EU0060 through EU0110-002, Monitoring

Please correct the following typographical errors

Delete the "e" at the end of the word "pursuante".

Add an "r" at the end of the word "manufacture"

Pages 22-23, Condition EU0060 through EU0110-002

MDNR has proposed to include in the Monitoring and Recordkeeping sections of this permit condition specific pressure drop ranges for purposes of determining compliance with the emission limitation. Boeing reiterates its objection to inclusion of the pressure drop ranges for each booth (See email from Bret Spoerle to Amish Daftari dated 3/10/03), and urges that MDNR modify the permit condition to reflect only the language of the underlying requirement, which requires only that the facility utilize certified filters and operate within the limits specified by the filter manufacturer. Since filters are routinely replaced, the Boeing facilities consume large numbers of filters during regular operations. In order to remain competitive and responsive to changes in the market, Boeing must retain maximum flexibility to switch filter suppliers, either due to technical or economic considerations. Since the acceptable pressure drop range is specific to each type of filter supplied by various filter manufacturers, inclusion of a specific pressure drop range in the permit will constrain Boeing's ability to utilize alternate suppliers or filters. Any change in filter could require a change in the permitted pressure drop range, which would be considered a significant permit modification. For this reason, the pressure drop ranges should not be placed in the Title V permit.

The last bulleted item in the Monitoring section states that the pressure drop should be monitored while primer or topcoat applications are occurring. As stated in § 63.745(g), pressure drop monitoring is only required for application primers and topcoats that contain Inorganic HAP. Therefore, please clarify that monitoring is required only for primer or topcoat application operations in which inorganic HAP containing coatings are spray applied.

In the Recordkeeping section, Boeing notes the following typographical errors:

Under "Primers and Topcoats" in 2. insert the word "as" in front of the word "applied".

Under Inorganic HAP Control in 1. add the phrase "complying with 63.745(g)" after the word "emissions".

Under Inorganic HAP Control delete 2. because this facility does not use water wash booths.

Also, in the Reporting section, Boeing noted the following typographical error:

Replace the word "conet" with "content"

Finally, since the facility has no waterwash booths, please delete the following:

All times when a primer or topcoat application was not immediately shut down when the pressure drop across a dry particulate filter or HEPA filter system, the water flow rate through a conventional waterwash system was outside the (§63.753(c)(1)(i))limit(s) specified by the filter or booth manufacturer or in locally prepared operating procedures.

And replace with:

All times when a primer or topcoat application was not immediately shut down when the pressure drop across a dry particulate filter or HEPA filter system was outside the limit(s) specified by the filter or booth manufacturer or in locally prepared operating procedures.

Page 23, Permit Condition (EU0060 through EU0110)-003, Emission Limitation

Boeing requests that the permit not include the actual calculated limits for the allowable emission rate of these units. These emission rates are based on tables in the regulation.

Note that the regulation has two limits. The facility must meet one of the two. The

table and equations should be referenced in the permit, since exceeding either one of those is not noncompliance, unless the other is also exceeded.

Page 23, Condition EU0060 through EU0110-003, Monitoring and Record Keeping

Based on calculations in the Statement of Basis EU0060, EU0070, and EU0080 meet their limits without control. In addition, these booths are required to meet stringent 40 CFR Part 63 Subpart GG filter requirements.

These inspections will cause the painters to spend significant additional time prior to painting each shift. In order to inspect all of the filters for "holes, imperfections, proper installation or other problems" the painters will have to move or remove the first stage filters, climb and move ladders, and then inspect each of the filters, which may have multiple pockets or folds to be examined. These inspections will be another opportunity for the filters to be damaged.

The Monitoring requirements arbitrarily imposed by DNR are unnecessary and overly burdensome. Under the Monitoring delete

Monitoring:

- The spray booth equipped with fabric filter shall not be operated without a fabric filter in place.
- Fabric filters shall be inspected for holes, imperfections, proper installation or other problems that could hinder the effectiveness of the filter.
- The filters shall be inspected each shift before spraying begins in a booth and after installation of a new filter.
- The manufacturer's recommendations shall be followed with regard to installation and frequency of replacement of the filters.

Record Keeping:

- The permittee shall maintain records of the inspections of fabric filters when they occur.
- All inspections, corrective actions, and instrument calibrations shall be recorded.

And replace with:

"Monitoring/Record Keeping:

- The one-time compliance demonstration is listed in the Statement of Basis.

Page 24, Condition (EU0060 through EU0110)-004, Emission Limitation

The second bulleted section refers to "10 CSR 10-5.295 (3)(A)", "subsection (3)(A)

of 10 CSR 10-5.295", and "subsection (5)(C)". These portions of the rule are not identified in the permit. Please add references to the section as it appears in the permit, or identify the regulatory citation for each provision listed in the permit (something similar to what was done for the Aerospace NESHAP), so that it is clear exactly what requirements are being referenced.

Page 24 & 25, Condition EU0060 through EU0110-004, Emission Limitations

First bullet, 1., last sentence remove "to" in the phrase "coating applicator that applies to primers".

Second bullet references Emission Limitation 1(a), but there is no Emission Limitation 1(a).

Page 24 & 25, Condition EU0060 through EU0110-004, Emission Limitations

The "Housekeeping procedures", "Hand-wipe cleaning", "Spray gun cleaning", and "Flush cleaning" sections should be included in the appropriate facility-wide emission units (EU0010 and EU0030) and not in these emission units. Please remove these provisions from this emission unit.

Page 24 & 25, Condition EU0060 through EU0110-004, Emission Limitations

Please add the following exemptions from 10 CSR 10-5.295(3)(I) to the emission limitations:

"(I) The following activities are exempt from this section:

1. Research and development;

2. Quality control;

3. Laboratory testing activities;

4. Chemical milling;

5. Metal finishing;

6. Electrodeposition except for the electrodeposition of paints;

7. Composites processing except for cleaning and coating of composite parts or components that become part of an aerospace vehicle or component as well as composite tooling that comes in contact with such composite parts or components prior to cure;

8. Electronic parts and assemblies except for cleaning a topcoating of completed assemblies;

9. Manufacture of aircraft transparencies;

10. Wastewater treatment operations;

11. Manufacturing and rework of parts and assemblies not critical to the vehicle's structural integrity or flight performance;

12. Regulated activities associated with space vehicles designed to travel beyond the limit of the earth's atmosphere including but not limited to satellites, space stations, and the space shuttle;

13. Utilization of primers, topcoats, specialty coatings, cleaning solvents, chemical milling maskants, and strippers containing VOC at concentrations less than 0.1 percent for carcinogens or 1 percent for noncarcinogens;

14. Utilization of touchup, aerosol can, and Department Defense classified coatings;

15. Maintenance and rework of antique aerospace vehicle and components; and

16. Rework of aircraft or aircraft components if the holder the Federal Aviation Administration design approval, or the holder's licensee, is not actively manufacturing the aircraft or aircraft components."

Page 25, Condition EU0060 through EU0110-004, Monitoring

A monitoring plan is required for (3)(B)3 control equipment. This facility uses compliant coatings instead of control equipment. This facility is not required to have a monitoring plan. Please delete:

> Each owner or operator of an aerospace manufacturing and/or rework operation shall submit a monitoring plan to the director that specifies the applicable operating parameter value, or range of values, to ensure ongoing compliance with paragraph (3)(B)3. of this rule. Any monitoring device, required by the monitoring plan, shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's specifications.

And combine monitoring with the drafted recordkeeping requirements.

Page 26, Condition EU0060 through EU0110-004, Record Keeping

First bullet 1., add a "s" to the word "coating"

The section refers to "subsection (3)(A)" and "paragraph (3)(B)2." These portions of the rule are not identified in the permit. Please add references to the section as it appears in the permit, or identify the regulatory citation for each provision listed in the permit (something similar to what was done for the Aerospace NESHAP), so that it is clear exactly what requirements are being referenced.

The second bullet relates to cleaning solvents. Please remove this section, as the provisions for cleaning solvents are located under other emission units.

Under the second bullet 1. please change the "g" in semi-agueous to a "q".

Page 26, Condition EU0120 through EU0130

Please delete EU0130 (SB-598-07) because this unit is no longer at the facility.

Page 26, Condition EU0120 through EU0130

Please delete entire condition (EU0120 through EU0130)-001 (40 CFR Part 63 Subpart GG) requirements from these sources. These sources have not been used for 40 CFR Part 63 Subpart GG and we do not expect that they will be needed in near future for aerospace parts.

Page 31, Condition (EU0120 through EU0130)-002, Emission Limitation

The second bulleted section refers to "10 CSR 10-5.295 (3)(A)", "subsection (3)(A) of 10 CSR 10-5.295", and "subsection (5)(C)". These portions of the rule are not identified in the permit. Please add references to the section as it appears in the permit, or identify the regulatory citation for each provision listed in the permit (something similar to what was done for the Aerospace NESHAP), so that it is clear exactly what requirements are being referenced.

Page 31, Condition (EU0120 through EU0130)-002, Emission Limitation

First bullet, 1., last sentence remove "to" in the phrase "coating applicator that applies to primers".

Second bullet references Emission Limitation •1, but there are several Emission Limitation •1 in this section—it is unclear what is being referenced.

Page 32 and 33, Condition (EU0120 through EU0130)-002, Emission Limitation

The "Housekeeping procedures", "Hand-wipe cleaning", "Spray gun cleaning", and "Flush cleaning" sections should be included in the appropriate facility-wide

emission units (EU0010 and EU0030)and not in these emission units. Please remove these provisions from this emission unit.

Page 31-33, Condition EU0060 through EU0110-004, Emission Limitations

Please add the following exemptions from 10 CSR 10-5.295(3)(I) to the emission limitations:

"(I) The following activities are exempt from this section:

1. Research and development;

2. Quality control;

3. Laboratory testing activities;

4. Chemical milling;

5. Metal finishing;

6. Electrodeposition except for the electrodeposition of paints;

7. Composites processing except for cleaning and coating of composite parts or components that become part of an aerospace vehicle or component as well as composite tooling that comes in contact with such composite parts or components prior to cure;

8. Electronic parts and assemblies except for cleaning a topcoating of completed assemblies;

9. Manufacture of aircraft transparencies;

10. Wastewater treatment operations;

11. Manufacturing and rework of parts and assemblies not critical to the vehicle's structural integrity or flight performance;

12. Regulated activities associated with space vehicles designed to travel beyond the limit of the earth's atmosphere including but not limited to satellites, space stations, and the space shuttle;

13. Utilization of primers, topcoats, specialty coatings, cleaning solvents, chemical milling maskants, and strippers containing VOC at concentrations less than 0.1 percent for carcinogens or 1 percent for noncarcinogens;

14. Utilization of touchup, aerosol can, and Department Defense classified coatings;

15. Maintenance and rework of antique aerospace vehicle and components; and

16. Rework of aircraft or aircraft components if the holder the Federal Aviation Administration design approval, or the holder's licensee, is not actively manufacturing the aircraft or aircraft components."

Page 33, Condition EU0120 through EU0130-002, Monitoring

A monitoring plan is required for (3)(B)3 control equipment. This facility uses compliant coatings instead of control equipment. This facility is not required to have a monitoring plan. Please delete:

> Each owner or operator of an aerospace manufacturing and/or rework operation shall submit a monitoring plan to the director that specifies the applicable operating parameter value, or range of values, to ensure ongoing compliance with paragraph (3)(B)3. of this rule. Any monitoring device, required by the monitoring plan, shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's specifications.

And combine monitoring with the drafted recordkeeping requirements.

Page 33, Condition EU0120 through EU0130-002, Record Keeping

First bullet 1., add a "s" to the word "coating"

The section refers to "subsection (3)(A)" and "paragraph (3)(B)2." These portions of the rule are not identified in the permit. Please add references to the section as it appears in the permit, or identify the regulatory citation for each provision listed in the permit (something similar to what was done for the Aerospace NESHAP), so that it is clear exactly what requirements are being referenced.

The second bullet relates to cleaning solvents. Please remove this section, as the provisions for cleaning solvents are located under other emission units.

Page 33, Condition EU0140 through EU0150

Emission Unit SB-598-08 (EU0150) has been removed from the facility as stated in Boeing letter 464C-BSS-4845 dated November 12, 1999.

Emission Unit MB-598-01 (EU0140) was composed of three sections. Two sections were removed from the facility and the remaining one was moved to Building 505

and renamed MB-505-01 as stated in Boeing letter 464C-BSS-4845 dated November 12, 1999.

Page 33, Emission Unit EU0140

Please move this emission unit to the group of emission units including EU0060 through EU0110. These units all have the same applicable requirements. This will help to streamline the permit.

Page 42, Emission Unit EU0160

This emission unit has been removed. It no longer exists and should be removed from the permit.

Page 43, Emission Units EU0170 and EU0180

Construction Permit # 0997-007 covers these two boilers.

Page 44, Condition (EU0170 through EU0220)-001, Emission Limitation

The limit is incorrectly stated in the units lb/hr. It should be in lb/MMBTU.

Page 44, Condition (EU0170 through EU0220)-001, Emission Limitation

We request that the calculated number not be inserted into the permit. Insignificant activities may be modified/added/removed without any permit modification. However, the facilities overall MHDR may change when these changes are made causing the emission limitation listed in the permit to be incorrect.

Page 44, Condition (EU0170 through EU0220)-001, Monitoring/Record Keeping

Please put the potential emission rate in the Statement of Basis instead of having a separate record keeping requirement. The Statement of Basis is already required to be kept with the Title V permit.

The potential to emit particulates from EU0170 through EU0220 (based on AP-42 emission factors) is:

Natural Gas:

(7.6 #/MMSCF) / (1,020 MMBTU/MMSCF) = **7.451 * 10^-3 lb/MMBTU**

Fuel Oil #2:

(1 #/1000 gals) / (140 MMBTU/1,000 gals) = **7.143 * 10^-3 lb/MMBTU**

These are both less than the limit.

Page 45, Condition, (EU0170 through EU0220)-002, Monitoring/Record Keeping/Reporting

The notification of a change of fuel type should only be for a fuel other than natural gas or fuel oil no. 2. The permittee has demonstrated compliance with the standard for either of these fuels. There is no reason notification is needed to assure compliance with this rule.

If notification is required, when is it required by?

Page 45, Condition, (EU0170 through EU0220)-002, Monitoring/Record Keeping/Reporting

The language following the third bullet is either excess or incomplete.

Page 46, EU0230 through EU0240-001,

Please combine EU0230 and EU240 into one emission unit.

Add the following § 63.743(b) requirement to the appropriate section of the permit

> Startup, shutdown, and malfunction plan. Each owner or operator that uses an air pollution control device or equipment to control HAP emissions shall prepare and operate in accordance with a startup, shutdown, and malfunction plan in accordance with § 63.6. Dry particulate filter systems operated per the manufacturer's instructions are exempt from a startup, shutdown, and malfunction plan. A startup, shutdown, and malfunction plan shall be prepared for facilities using locally prepared operating procedures. In addition to the information required in § 63.6, this plan shall also include the following provisions:
>
> (1) The plan shall specify the operation and maintenance criteria for each air pollution control device or equipment and shall include a standardized checklist to document the operation and maintenance of the equipment;
> (2) The plan shall include a systematic procedure for identifying malfunctions and for reporting them immediately to supervisory personnel; and
> (3) The plan shall specify procedures to be followed to ensure that equipment or process malfunctions due to poor maintenance or other preventable conditions do not occur.

Page 46, EU0230 through EU0240-001, Emission Limitation/Operation Limitation

Add § 63.746(b)(4) requirements for the Boeing baghouse used in the depainting operation as follows

> Each owner or operator of a new or existing depainting operation complying with § 63.746 (b)(2), that generates airborne inorganic HAP emissions from dry media blasting equipment, shall:
> (a) Perform the depainting operation in an enclosed area, unless a closed-cycle depainting system is used.
> (b) Pass any air stream removed from the enclosed area or closed-cycle depainting system through a dry particulate filter system, certified using the method described in § 63.750(o) to meet or exceed the efficiency data points in Tables 1 and 2 of § 63.745, through a baghouse, or through a waterwash system before exhausting it to the atmosphere.
> (c) Mechanical and hand sanding operations are exempt from the requirements in paragraph (b)(4) of this section.

Delete the fourth and fifth bullet items. These apply to control systems which Boeing does not use.

Page 48-49 , EU0230 through EU0240-001, Recordkeeping

Delete the second and third bullet. This applies to controls systems and Boeing does not use a control system for depainting.

Delete the seventh bullet (*Inorganic HAP emissions)* because Boeing uses a baghouse for their depainting operation.

Page 49, EU0230 through EU0240-001, Reporting

First bullet, 7. can be deleted because Boeing uses a baghouse and is not subject to these requirements.

Page 49, EU0230 through EU0240-001, Reporting

There are no pressure drop or water flow rate requirements for this unit. Delete:

- The permittee shall submit annual reports occurring every 12 months from the date of the notification of compliance status that identify: (§63.753(d)(2))

1. The average volume per aircraft of organic HAP-containing chemical strippers or weight of organic HAP used for spot stripping and decal removal operations if it exceeds the limits specified in § 63.746(b)(3); and (§63.753(d)(2)(i))
2. The number of times the pressure drop limit(s) for each filter system or the number of times the water flow rate limit(s) for each waterwash system

were outside the limit(s) specified by the filter or booth manufacturer or in locally prepared operating procedures. (§63.753(d)(2)(ii))

Replace with

- The permittee shall submit annual reports occurring every 12 months that identify: (§63.753(d)(2))
  1. The average volume per aircraft of organic HAP-containing chemical strippers or weight of organic HAP used for spot stripping and decal removal operations if it exceeds the limits specified in § 63.746(b)(3). (§63.753(d)(2)(i))

Page 50, Emission Unit EU0250

Please delete this emission unit. This emission unit does not exist.

Page 50, Emission Unit EU0270

Please delete this emission unit. It has been removed from the facility.

Page 51, Emission Units EU0310-EU0320

EIQ Reference number refers to the emission units from the previous section.

Page 51, Emission units EU0310-EU0320

Please change the description of each unit to Fuel Oil #2/Diesel fired. The permittee considers these fuels to be equivalent. The same requirements apply to the units if either fuel is used.

Page 52, Condition EU0330

This emission unit only applies to materials generated from operations governed by 40 CFR Part 63, Subpart GG and has no monitoring, recordkeeping, or reporting requirements on it's own. Boeing suggests that the requirements as stated in §63.748 be added to each 40 CFR Part 63, Subpart GG emission unit and that EU0330 be deleted.

Page 53, Condition EU0340-001, Monitoring and Record Keeping

There is no requirement for a vapor recovery system on this storage tank. None of the monitoring requirements are required by the regulation. The listed monitoring is asking for monitoring of emission limitations that are not listed under emission limitation. In addition, there is a typographical error in the first sentence under the Record Keeping. An, is listed instead of and. Please delete

Monitoring:
The permittee shall monitor the vapor recovery system and the gasoline loading equipment in a manner that prevents:

- Gauge pressure from exceeding 4500 pascals (18 in. of water) in the delivery vessel.
- A reading equal to or greater than 100% of the lower explosive limit (LEL, measured as propane) at 2.5 centimeters from all points on the perimeter of a potential leak source during loading and transfer operations
- Visible liquid leaks during loading or transfer operations.

Record Keeping:
Keep record documenting the number of delivery vessels unloaded an their owners. Also keep records of routine and unscheduled maintenance and repairs and of all results of tests conducted. Records shall be kept for five (5) years and made available upon request.

Replace with

Monitoring/Record Keeping:
Keep records documenting the number of delivery vessels unloaded and their owners. Records shall be kept for five (5) years and made available upon request.

Page 54, Condition EU0360-001, Monitoring

The monitoring and record keeping requirements should be written to where they can be easily understood. The two year record retention conflicts with the five year retention period required in the General Record Keeping and Reporting Requirements (10 CSR 10-6.065(6)(C)1.C). Please change the monitoring and recordkeeping provisions to the following:

Monitoring/Record Keeping:
The permittee shall keep records of the tank dimensions for the life of the tank.

Page 55, Condition EU0370-002

The methodology for calculating emissions is provided by formula in 40 CFR §63.465(c). However, it should be noted that Boeing does not remove solid waste described as "SSR(i)" in 40 C.F.R. §63.465(c)(1) from the vapor degreasers subject to 40 C.F.R. Part 63, Subpart T. The liquid solvent described as LSR(i) in 40 C.F.R. §63.465(c)(1) could be contaminated with solids, grease, water, and other materials. In order to address this problem, EPA Region VII has issued a letter determination regarding how to make this calculation, dated March 12, 1997 and published in the Applicability Determination Index, Control Number M970030. According to this guidance, "when calculating the amount of halogenated HAP liquid solvent removed from a solvent cleaning machine, EPA suggests using the same halogenated HAP concentration of the liquid removed as that of the liquid added to the machine." This

methodology is used by Boeing and we would like this documented in our statement of basis.

Page 56, Condition EU0370-002, Monitoring

Since there is no "paragraph c" in the permit, please change in the first bullet "paragraph(c)" to "63.465(c)".

Page 56, Condition EU0370-002, Monitoring

Since Boeing does not use a continuous web cleaning machine, please delete the following phrase

> Except as provided in paragraphs (f) and (g) of this section for continuous web cleaning machines,

Page 56 & 57, Condition EU0370-002, Monitoring

Since the Boeing vapor degreaser has a solvent air interface, please delete the references and equations for vapor degreasers without a solvent/air interface in the second bullet.

Page 57, Condition EU0370-002, Monitoring

Item 4 under the second bullet requires the permittee to calculate potential to emit from "all solvent cleaning operations." The potential to emit is not required for any calculations performed for 40 CFR Part 63 Subpart T compliance. Please delete item 4.

Page 57, Condition EU0370-002, Reporting

Some of the applicable wording seemed to be missing. Delete

Reporting:

- Initial Statement of Compliance – due within 150 days of NESHAP or startup, whichever is later.
- Each owner or operator of a batch vapor or in-line solvent cleaning machine complying with the provisions of § 63.464 shall submit a solvent emission report every year. This solvent emission report shall contain the requirements specified in paragraphs (g)(1) through (g)(4) of this section.
  1. The size and type of each unit subject to this subpart (solvent/air interface area or cleaning capacity).
  2. The average monthly solvent consumption for the solvent cleaning machine in kilograms per month.
  3. The 3-month monthly rolling average solvent emission estimates calculated each

month using the method as described in § 63.465(c).

4. The reports required under paragraphs (f) and (g) of this section can be combined into a single report for each facility.(§63.468(g))

- Each owner or operator of a batch vapor or in-line solvent cleaning machine shall submit an exceedance report to the Administrator semiannually except when, the Administrator determines on a case-by-case basis that more frequent reporting is necessary to accurately assess the compliance status of the source or, an exceedance occurs. Once an exceedance has occurred the owner or operator shall follow a quarterly reporting format until a request to reduce reporting frequency under paragraph (i) of this section is approved. Exceedance reports shall be delivered or postmarked by the 30th day following the end of each calendar half or quarter, as appropriate. The exceedance report shall include the applicable information in paragraphs (h) (1) through (3) of this section.
  1. Information on the actions taken to comply with § 63.463 (e) and (f). This information shall include records of written or verbal orders for replacement parts, a description of the repairs made, and additional monitoring conducted to demonstrate that monitored parameters have returned to accepted levels.
  2. If an exceedance has occurred, the reason for the exceedance and a description of the actions taken.
  3. If no exceedances of a parameter have occurred, or a piece of equipment has not been inoperative, out of control, repaired, or adjusted, such information shall be stated in the report.(§63.468(h))
- An owner or operator who is required to submit an exceedance report on a quarterly (or more frequent) basis may reduce the frequency of reporting to semiannual if the conditions in paragraphs (i)(1) through (i)(3) of this section are met.
  1. The source has demonstrated a full year of compliance without an exceedance.
  2. The owner or operator continues to comply with all relevant recordkeeping and monitoring requirements specified subpart A (General Provisions) and in this subpart.
  3. The Administrator does not object to a reduced frequency of reporting for the affected source as provided in paragraph (e)(3)(iii) of subpart A (General Provisions).(§63.468(i))
- The permittee shall report to the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten (10) days after any exceedance of any of the terms imposed by this regulation, or any malfunction which could possibly cause an exceedance of this regulation.

Replace with

Reporting:

- The permittee shall submit an initial notification report to the Administrator no later than August 29, 1995. (§ 63.468(a))
- Initial Statement of Compliance – due within 150 days of NESHAP or startup, whichever is later. (§ 63.468(c))
- Each owner or operator of a batch vapor or in-line solvent cleaning machine complying with the provisions of § 63.464 shall submit a solvent emission report every year. This solvent emission report shall contain:

1. The size and type of each unit subject to 40 CFR Part 63 Subpart T (solvent/air interface area or cleaning capacity). (§ 63.468(g)(1))
2. The average monthly solvent consumption for the solvent cleaning machine in kilograms per month. (§ 63.468(g)(2))
3. The 3-month monthly rolling average solvent emission estimates calculated each month using the method as described in § 63.465(c). (§ 63.468(g)(3))
4. The reports required under §63.468 (f) and (g) can be combined into a single report for each facility.(§63.468(g)(4))

- Each owner or operator of a batch vapor or in-line solvent cleaning machine shall submit an exceedance report to the Administrator semiannually except when, the Administrator determines on a case-by-case basis that more frequent reporting is necessary to accurately assess the compliance status of the source or, an exceedance occurs. Once an exceedance has occurred the owner or operator shall follow a quarterly reporting format until a request to reduce reporting frequency under §63.468(i) is approved. Exceedance reports shall be delivered or postmarked by the 30th day following the end of each calendar half or quarter, as appropriate. The exceedance report shall include:
  1. Information on the actions taken to comply with § 63.463 (e) and (f). This information shall include records of written or verbal orders for replacement parts, a description of the repairs made, and additional monitoring conducted to demonstrate that monitored parameters have returned to accepted levels. (§ 63.468(h)(1))
  2. If an exceedance has occurred, the reason for the exceedance and a description of the actions taken. (§ 63.468(h)(2))
  3. If no exceedances of a parameter have occurred, or a piece of equipment has not been inoperative, out of control, repaired, or adjusted, such information shall be stated in the report.(§63.468(h)(3))
- An owner or operator who is required to submit an exceedance report on a quarterly (or more frequent) basis may reduce the frequency of reporting to semiannual if:
  1. The source has demonstrated a full year of compliance without an exceedance. (§ 63.468(i)(1))
  2. The owner or operator continues to comply with all relevant recordkeeping and monitoring requirements specified subpart A (General Provisions) and in this subpart. (§ 63.468(i)(2))
  3. The Administrator does not object to a reduced frequency of reporting for the affected source as provided in paragraph (e)(3)(iii) of subpart A (General Provisions). (§63.468(i)(3))
- The permittee shall report to the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten (10) days after any exceedance of the applicable 3-month rolling average in the Emission Limitation.

Page 58, Condition EU0370-003, Emission limitation

The first line should reference "Each vapor degreaser" not "Each cold cleaner".

Page 59, Condition EU0370-003, Emission limitation

Item 5 has a typo. "avoce" ????

Item 8 has a typo. "proff" ????

Page 60, EU0400

This unit is no longer present. Please remove it from the permit.

Page 61, Condition (EU0380 through EU0390)-002, Operation Limitation

The units only burn natural gas, not fuel oil.

Page 61, Condition (EU0380 through EU0390)-002, Monitoring/Record Keeping

The units are natural gas units. The fact that they burn natural gas is how compliance is verified. The sulfur content of the natural gas does not need to be verified. Please remove the requirement for maintaining fuel receipts.

Page 61, Condition (EU0380 through EU0390)-002, Reporting

The first bullet implies that other fuels may be used so long as the agency is notified within 10 days of the fuel switch. The operational limitation states that the only fuel that may be used is natural gas (corrected from number 2 fuel oil). If the unit can only use one fuel, then there is no notification possible. If the unit can change fuels, but must notify the agency within 10 days, then the operational limit is incorrect and excess. Therefore please delete the operational limitation or the reporting requirement.

Page 61-64, EU0410 through EU0460 and EU0470 through EU0530

Please combine all of these units into a single unit. The agency has listed natural gas units less than 10 MMBTU/hr, but greater than 1 MMBTU/hr MHDR. In the previous permit these were all grouped as one single unit. We feel there is no reason not to group them now. They are all natural gas units that are less than 10 MMBTU/hr MHDR individually. They were grouped on form C02 in the application as insignificant activities. It would be appropriate to include these in a single emission unit covered by 10 CSR 10-5.030 and 10 CSR 6.260. The existing and new requirements of 10 CSR 10-5.030 could both be included in that unit. (Note that as currently written the permit shows EU0530 (CS-STC-01) as a new unit under 10 CSR 10-5.030. Some of the heaters included in that unit are new, but some are existing.)

Page 61 and 63, (EU0410 through EU0460)-001 and (EU0470 through EU0530)-001, Emission Limitation

We request that the calculated number not be inserted into the permit. Insignificant

activities may be modified/added/removed without any permit modification. However, the facilities overall MHDR may change when these changes are made causing the emission limitation listed in the permit to be incorrect.

Page 61 and 63, (EU0410 through EU0460)-001 and (EU0470 through EU0530)-001

The permit conditions are missing the –001

Page 62 and 64, (EU0410 through EU0460)-001 and (EU0470 through EU0530)-001, Monitoring/Record Keeping

Please put the potential emission rate in the Statement of Basis instead of having a separate record keeping requirement. The Statement of Basis is already required to be kept with the Title V permit.

The potential to emit particulates from EU0410 through EU0530 (based on AP-42 emission factors) is:

Natural Gas:

(7.6 #/MMSCF) / (1,020 MMBTU/MMSCF) = **7.451 * 10^-3 lb/MMBTU**

This is less than the limit.

Page 62 and 64, Condition, (EU0410 through EU0460)-002 and (EU0470 through EU0530)-002

The permit condition are missing the –002

Page 62 and 64, Condition, (EU0410 through EU0460)-002 and (EU0470 through EU0530)-002, Emission Limitation

The emission limitations for these units apply to fuel oil and coal. These units only burn natural gas.

Page 62 and 64, Condition, (EU0410 through EU0460)-002 and (EU0470 through EU0530)-002, Monitoring/Record Keeping/Reporting

The second and fourth bullets imply that other fuels may be used so long as the agency is notified within 10 days of the fuel switch. The operational limitation states that the only fuel that may be used is natural gas. If the unit can only use one fuel, then there is no notification possible. If the unit can change fuels, but must notify the agency within 10 days, then the operational limit is incorrect and excess. Therefore please delete the operational limitation or the reporting requirements.

Page 62, Condition, (EU0410 through EU0460)-002 and (EU0470 through EU0530)-002, Monitoring/Record Keeping/Reporting

The language following the third bullet is either excess or incomplete.

Page 64, EU0550

This unit has been removed. Please remove it from the permit.

Page 65, EU0560

This unit has been removed. Please remove it from the permit.

Page 66, EU0570

This unit has been removed. Please remove it from the permit.

Page 68, 10 CSR 10-5.070, *Open Burning Restrictions*

Paragraph (e.), Please delete the phrase "and previous DNR inspection reports". This recordkeeping is not required by the regulation and is overly broad. For example, RCRA DNR inspection reports would need to be kept under the Title V permit.

Page 69, 10 CSR 10-6.080, Emission Standards for Hazardous Air Pollutants
40 CFR Part 61 Subpart M, National Emission Standard for Asbestos

To clarify what is required under 40 CFR Part 61 Subpart M, please reword this section as follows:

10 CSR 10-6.080
Emission Standards for Hazardous Air Pollutants
40 CFR Part 61 Subpart M
National Emission Standard for Asbestos

Emission Limitations:

(1) Before engaging in any renovation or demolition activity that would disturb more than 260 linear feet of regulated asbestos containing material ("RACM") on pipes or 160 square feet of RACM on other building components, the permittee shall hire a certified asbestos abatement contractor to abate the RACM in the part of the facility that will be disturbed by the renovation or demolition activity.

(2) Prior to commencement of any demolition or renovation activity at the facility, the permittee shall inspect the part of the facility that will be affected by the demolition or renovation activity for RACM.

(3) The permittee shall require the certified asbestos abatement contractor hired to abate RACM in accordance with subsection (1) above to comply with the following:
(a) the work practices for asbestos emission control pursuant to 61.145(c);
(b) the work practices and procedures for waste disposal pursuant to 61.150; and
(c) the work practices for air cleaning pursuant to 61.152.

Monitoring/Record Keeping:
The permittee or its qualified asbestos abatement contractor shall keep records as required by 40 CFR 61.145(c)(7), 61.145(c)(8) and 61.150(d)(1).

Reporting:
(1) Notices required by 61.145(b) shall be submitted by the Missouri Certified Asbestos Abatement contractor or the permittee.
(2) These notices do not need to be certified by a responsible official.

Page 69, 10 CSR 10-6.250, *Asbestos Abatement Projects – Certification, Accreditation, and Business Exemption Requirements*

The requirements for 10 CSR 10-6.250 on pages 69 and SB-1 seem to conflict. Additionally, in EPA's order dated July 31, 2002 responding to the Sierra Club-Ozark Chapter petition that EPA object to Doe Run Company's operating permit, Petition No. VII-1999-001, it is stated:

> "With regard to Condition PW002,for reasons not raised by the Petitioner, but otherwise identified by EPA Region 7,EPA will ask the permitting authority to remove the "Asbestos Abatement Projects -Certification, Accreditation, and Business Exemption Requirements " found at 10 CSR 10-6.250 from the title V permit. These asbestos-related requirements are not derived from Clean Air Act authority and therefore may not be placed in the title V permit as federally-enforceable Clean Air Act requirements."

Please clarify the current requirements under 10 CSR 10-6.250.

Page 72, V. General Permit Requirements, General Record Keeping and Reporting Requirements, II) Reporting, A) 3)

There does not seem to be any regulatory basis for this requirement. Please delete II) Reporting, A) 3).

Page 72, V. General Permit Requirements, General Record Keeping and Reporting Requirements, II) Reporting, B)

This is not the regulatory language and has a different meaning than the regulatory

language. The language in the draft permit is:

> "Each report must identify any deviations from emission limitations, monitoring, record keeping, reporting, or any other requirements of the permit, this includes deviations or Part 64 exceedances."

The regulatory language from 10 CSR 10-6.065(6)(C)1.C III.(b) is:

> "(b) Each report submitted under subpart (6)(C)1.C.(III)(a) of this rule shall identify any deviations from permit requirement, since the previous report, that have been monitored by the monitoring systems required under the permit, and any deviations from the monitoring, recordkeeping and reporting requirements of the permit;"

The regulatory language should be used.

Page 72, V. General Permit Requirements, General Record Keeping and Reporting Requirements, II) Reporting, D)

There appears to be a typo in the permit language. There should be a section 3) following "as soon as practicable." and before "Any other deviations". There also could be a section 4) which identifies the address for the reports. This would make it clear that all three types of supplemental reports were to be sent to that same address.

This is not the regulatory language. Listing the ten (10) days under A) makes it unclear when reports required under 1) or 2) are required. According to A) all supplemental reports are required no later than 10 days after any exceedance... However, under 1) reports are required within two (2) working days and under 2) reports are required as soon as practicable. In addition, the deadline for other supplemental reports is listed under 3) below and under reports for each individual unit.

Also, the language in the permit specifies any exceedance of any applicable rule, which is far more inclusive than the regulatory language. If all supplemental reports are desired for all excedances, even those which pose no imminent or substantial danger to the public health, safety, or the environment, then each of those terms should be identified under the reporting for each emission unit as gap filling, which it already is. The language from 10 CSR 10-6.065 should not be modified.

The language in the draft permit is:

> "A) Submit supplemental reports as required or as needed. Supplemental reports are required no later than ten (10) days after any exceedance of any applicable rule, regulation or other restriction. All reports of deviations shall identify the cause or probable cause of the deviations and any corrective

actions or preventative measures taken.

1) Notice of any deviation resulting from an emergency (or upset) condition as defined in paragraph (6)(C)7 of 10 CSR 10-6.065 (Emergency Provisions) shall be submitted to the permitting authority either verbally or in writing within two (2) working days after the date on which the emission limitation is exceeded due to the emergency, if you wish to assert an affirmative defense. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that indicate an emergency occurred and that you can identify the cause(s) of the emergency. The permitted installation must show that it was operated properly at the time and that during the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or requirements in the permit. The notice must contain a description of the emergency, the steps taken to mitigate emissions, and the corrective actions taken.
2) Any deviation that poses an imminent and substantial danger to public health, safety or the environment shall be reported as soon as practicable.

Any other deviations identified in the permit as requiring more frequent reporting than the permittee's semiannual report shall be reported on the schedule specified in the permit. These supplemental reports shall be submitted to the Air Pollution Control Program, Enforcement Section, P.O. Box 176, Jefferson City, MO 65102 no later than ten (10) days after any exceedance of any applicable rule, regulation, or other restriction."

The regulatory language from 10 CSR 10-6.065(6)(C)1.C III.(c) is:

"(c) In addition to semiannual monitoring reports, each permittee shall be required to submit supplemental reports as indicated here. All reports of deviations shall identify the cause or probable cause of the deviations and any corrective actions or preventative
measures taken.
I. Notice of any deviation resulting from an emergency (or upset) condition as defined in paragraph (6)(C)7. of this rule shall be submitted to the permitting authority either verbally or in writing within two (2) working days after the date on which the emission
limitation is exceeded due to the emergency, if the permittee wishes to assert an affirmative defense. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that
indicate an emergency occurred and the permittee can identify the cause(s) of the emergency. The permitted facility must show that it was operated properly at the time and that during the period of the emergency the permittee took all

reasonable steps to
minimize levels of emissions that exceeded the emission standards or requirements in the permit. The notice must contain a description of the emergency, steps taken to mitigate emissions, and the corrective actions taken.
II. Any deviation that poses an imminent and substantial danger to public health, safety or the environment shall be reported as soon as practicable.
III. Any other deviations identified in the permit as requiring more frequent reporting than the permittee's semiannual report shall be reported on the schedule specified in the permit;"

The regulatory language should be used.

Page 73, General Record Keeping and Reporting Requirements, 10 CSR 10-6.065(6)(C)1.C, II) Reporting E)

Please clarify in the statement of basis. This section seems to deal with the reports required by 10 CSR 10-6.065. However, a Title V permit may include many reports that are not required by 10 CSR 10-6.065, but are required by some other applicable requirement. Are these reports required to be certified? In some cases these reports may be minor monthly reports, such as our coal reports for our St. Louis Facility, that have been submitted for many years without certification.

Page 74

The following are listed without any requirements:

Reasonably Anticipated Operating Scenarios
10 CSR 10-6.065(6)(C)1.I.

Emissions Trading
10 CSR 10-6.065(6)(C)1.J.

Page 74, Compliance Requirements, 10 CSR 10-6.065(6)(C)3., I)

The language from the draft permit is:

"I) Any document (including reports) required to be submitted **under this permit** shall contain a certification signed by the responsible official." (Bold added)

The regulatory language from 10 CSR 10-6.065(6)(C)3. is:

"A. General requirements, including certification. Consistent with the monitoring and related recordkeeping and reporting requirements of this

paragraph, the operating permit must include compliance certification, testing, monitoring, reporting and recordkeeping requirements sufficient to assure compliance with the terms and conditions of the permit. Any document (including reports) required to be submitted **under this rule** shall contain a certification signed by a responsible official as to the results of the required monitoring." (Bold added)

The permit incorporates many other rules. These rules may have reporting requirements that become a requirement of the permit, but they are not a requirement of 10 CSR 10-6.065 – the rule. The fact that this language has been changed is an indication that the agency recognized this distinction. The fact that this language has been changed is an indication that the agency recognized this distinction.

Please correct this, so that the meaning of the permit is the same as the meaning in the underlying rule. Not correcting this discrepancy would result in requiring the responsible official to certify minor reports that may be due monthly, or even weekly. These reports may have been submitted to the agency for years under the regulations/construcion permits that require them. They should not be certified by the responsible official now.

Page 74, Compliance Requirements, 10 CSR 10-6.065(6)(C)3., IV)

Two issues with the following language:

"These certifications shall be submitted annually on April 1st, unless the applicable requirement specifies more frequent submission."

This would be better written by substituting "by" for "on". The report must be submitted by April 1st not necessarily on April 1st.

What does the language following "unless" mean? If we have a MACT standard, which requires a quarterly report (or compliance certification) do we now have to submit my Title V compliance certification quarterly? Do we now have to submit a Title V compliance certification for the covered unit(s) separately from the rest of the facility? Do we have to submit two compliance certifications quarterly? (One for the MACT and one for the operating permit) Please change the language to:

"These certifications shall be submitted annually by April 1st.

Page 75, Emergency Provisions, 10 CSR 10-6.065(6)(C)7.

Please change "you" to "permittee".

Page 76-77, Responsible Official, 10 CSR 10-6.020(2)(R)12.

Please add the following sentence:

> The Vice President of the Shared Services Group (Gerard J. Olsen) and the Director of Safety, Health and Environmental Affairs (Michael J. Dwyer) may serve as alternate Responsible Officials should Mr. Van Gels be unavailable.

Page 77, Reopening Permit For Cause, 10 CSR 10-6.065(6)(E)6.

Paragraph 3), change the word "ot" to "to"

Statement of Basis, General Comments

Page SB-1, Other Air Regulations Determined Not to Apply to the Operating Permit

10 CSR 10-6.080 and 10 CSR 10-6.250 are included in the permit as applying to the facility. (See page 69 of the draft permit).

SB-3, 40 CFR Part 63, Subpart Q

Change the word "operatied" to "operated"

Please add the fact that Boeing does not use a "control device" as defined by 40 CFR Part 63, Subpart GG in primer or topcoat application or depainting operations.

Page SB-12 through SB-13, EU0140

This unit is now Emission Unit # MB-505-01.

Page SB-13 through SB-15, EU0150

This unit has been removed and this information can be removed from the Statement of Basis.

Page SB-16, Additional Recommended Permit Revision #6

This comment states that if there were any leaking spray guns, the permittee would also be required to report to the agency within ten days. EU0030-001 addresses leaking spray gun cleaners, but not leaking spray guns. The permittee is unaware of any regulation that regulates whether spray guns leak or not, or requiring reporting leaking spray guns.

Page SB-16 through SB-17, Additional Recommended Permit Revision #8

Boeing appreciates the agency's clarification of the significance of incorporating the construction permits by reference.

Page SB-18, Additional Recommended Permit Revision #10

Boeing has requested the pressure drop limits not be included. If these requests are accepted this provision should be modified to reflect the change.

Page SB-18, 2. 10 CSR 10-5.330

The second paragraph references Boeing's St. Louis County facility. This facility is Boeing's St. Charles County facility.

Page SB-18, 4.

EU0040 and EU0050 are not identified in any previous permit or other document. Based on construction permit number 0396-014, these must be the cold cleaners that were identified in the previously issued permit as CC-598-02 and CC-598-03. These units have been removed and were replaced by CC-505-01. (CC-505-01 is a solvent based cold cleaner used for cleaning electrical components (e.g., circuit boards).) This was documented in letter 464C-BSS-4845 and sent to Missouri Department of Natural Resources on November 12, 1999. Please include this unit in the permit. It is covered by construction permit number 0396-014.

APPENDIX

Excerpts from Method 22 (40 CFR Part 60 Appendix A Method 22)

"1.0 Scope and Application

This method is applicable for the determination of the frequency of fugitive emissions from stationary sources, only as specified in an applicable subpart of the regulations. This method also is applicable for the determination of the frequency of visible smoke emissions from flares.

2.0 Summary of Method

2.1 Fugitive emissions produced during material processing, handling, and transfer operations or smoke emissions from flares are visually determined by an observer without the aid of instruments.
2.2 This method is used also to determine visible smoke emissions from flares used for combustion of waste process materials.
2.3 This method determines the amount of time that visible emissions occur during the observation period (i.e., the accumulated emission time). This method does not require that the opacity of emissions be determined. Since this procedure requires only the determination of whether visible emissions occur and does not require the determination of opacity levels, observer certification according to the procedures of Method 9 is not required. However, it is necessary that the observer is knowledgeable with respect to the general procedures for determining the presence of visible emissions. At a minimum, the observer must be trained and knowledgeable regarding the effects of background contrast, ambient lighting, observer position relative to lighting, wind, and the presence of uncombined water (condensing water vapor) on the visibility of emissions. This training is to be obtained from written materials found in References 1 and 2 or from the lecture portion of the Method 9 certification course."

"11.0 Analytical Procedure

11.1 Selection of Observation Location. Survey the affected facility, or the building or structure housing the process to be observed, and determine the locations of potential emissions. If the affected facility is located inside a building, determine an observation location that is consistent with the

requirements of the applicable regulation (i.e., outside observation of emissions escaping the building/structure or inside observation of emissions directly emitted from the affected facility process unit). Then select a position that enables a clear view of the potential emission point(s) of the affected facility or of the building or structure housing the affected facility, as appropriate for the applicable subpart. A position at least 4.6 m (15 feet), but not more than 400 m (0.25 miles), from the emission source is recommended. For outdoor locations, select a position where the sunlight is not shining directly in the observer's eyes.

11.2 Field Records.

11.2.1 Outdoor Location. Record the following information on the field data sheet (Figure 22-1): Company name, industry, process unit, observer's name, observer's affiliation, and date. Record also the estimated wind speed, wind direction, and sky
condition. Sketch the process unit being observed, and note the observer location relative to the source and the sun. Indicate the potential and actual emission points on the sketch.

11.2.2 Indoor Location. Record the following information on the field data sheet (Figure 22-2): Company name, industry, process unit, observer's name, observer's affiliation, and date. Record as appropriate the type, location, and intensity of lighting on the data sheet. Sketch the process unit being observed, and note the observer location relative to the source. Indicate the potential and actual fugitive emission points on the sketch.

11.3 Indoor Lighting Requirements. For indoor locations, use a light meter to measure the level of illumination at a location as close to the emission source(s) as is feasible. An illumination of greater than 100 lux (10 foot candles) is considered necessary for proper application of this method.

11.4 Observations.

11.4.1 Procedure. Record the clock time when observations begin. Use one stopwatch to monitor the duration of the observation period. Start this stopwatch when the observation period begins. If the observation period is divided into two or more segments by process shutdowns or observer rest breaks (see Section 11.4.3), stop the stopwatch when a break begins and restart the stopwatch without resetting it when the break ends. Stop the stopwatch at the end of the observation period. The accumulated time indicated by this stopwatch is the duration of observation period. When the observation period is completed, record the clock time. During the observation period, continuously watch the emission source. Upon observing an emission (condensed water vapor is not considered an emission), start the second accumulative stopwatch; stop the watch when the emission stops. Continue this procedure for the entire observation period. The accumulated elapsed time on this stopwatch is the total time emissions were visible during the observation period (i.e., the emission time.)

11.4.2 Observation Period. Choose an observation period of sufficient length to meet the requirements for determining compliance with the emission

standard in the applicable subpart of the regulations. When the length of the observation period is specifically stated in the applicable subpart, it may not be necessary to observe the source for this entire period if the emission time required to indicate noncompliance (based on the specified observation period) is observed in a shorter time period. In other words, if the regulation prohibits emissions for more than 6 minutes in any hour, then observations may (optional) be stopped after an emission time of 6 minutes is exceeded. Similarly, when the regulation is expressed as an emission frequency and the regulation prohibits emissions for greater than 10 percent of the time in any hour, then observations may (optional) be terminated after 6 minutes of emission are observed since 6 minutes is 10 percent of an hour. In any case, the observation period shall not be less than 6 minutes in duration. In some cases, the process operation may be intermittent or cyclic. In such cases, it may be convenient for the observation period to coincide with the length of the process cycle.

11.4.3 Observer Rest Breaks. Do not observe emissions continuously for a period of more than 15 to 20 minutes without taking a rest break. For sources requiring observation periods of greater than 20 minutes, the observer shall take a break of not less than 5 minutes and not more than 10 minutes after every 15 to 20 minutes of observation. If continuous observations are desired for extended time periods, two observers can alternate between making observations and taking breaks.

11.5 Recording Observations. Record the accumulated time of the observation period on the data sheet as the observation period duration. Record the accumulated time emissions were observed on the data sheet as the emission time. Record the clock time the observation period began and ended, as well as the clock time any observer breaks began and ended."